

THE HONORABLE TANA LIN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

ISHAN WAHI, NIKHIL WAHI, and
SAMEER RAMANI,

Defendants.

No. 2:22-cv-01009

**JOINT STIPULATED NOTICE TO
EXTEND THE TIME TO RESPOND**

**NOTE ON MOTION CALENDAR:
NOVEMBER 23, 2022**

JOINT STIPULATED NOTICE TO EXTEND THE TIME
TO RESPOND
CASE No. 2:22-cv-01009

SEC
100 F Street NE
Washington, D.C., 20549
Tel. 202-551-4737 • sec.gov

Pursuant to Judge Lin's Standing Order for All Civil Cases, Plaintiff Securities and Exchange Commission ("SEC") and Defendants Ishan Wahi and Nikhil Wahi, by and through their undersigned counsel, stipulate to a revised schedule for the SEC to file an Amended Complaint and for Defendants to respond.¹ The current deadline for Defendants to respond to the original Complaint is December 1, 2022 (Dkt. #23). The SEC has informed Defendants that it plans to file an Amended Complaint as of right on December 22, 2022. To conserve resources, the Parties agree that Defendants should not file a Response to the Complaint on December 1, 2022. Instead, Defendants' Response to the Amended Complaint would be due February 6, 2023.

The Parties therefore respectfully stipulate as follows:

1. The Complaint in this case was filed on July 21, 2022. (Dkt. #1).
2. Based on the service date, the deadline for Defendants to respond to the Complaint under Fed. R. Civ. P. 12(a)(1) was August 22, 2022. (Dkt. #7, #8).
3. In the Parties' Joint Motion to Expand the Time to Respond, they noted that the SEC may file an Amended Complaint, and that the Parties may therefore seek further revisions to Defendants' time to respond. (Dkt. # 19 at ¶ 8).
4. On November 4, 2022, the Court ordered that Defendants had until December 1, 2022 to respond to the SEC's Complaint and set dates for the SEC's Opposition and Defendants' Reply. (Dkt. # 23).
5. The SEC intends to file an Amended Complaint on December 22, 2022, which, under the existing schedule, would have been the last day to file an Amended Complaint as of right pursuant to Federal Rule of Civil Procedure 15(a)(1)(B).
6. To conserve resources, the Parties agree that, instead of Defendants filing a Response to the original Complaint on December 1, 2022, that could be rendered moot by the SEC's Amended Complaint, the Defendants should instead have until February 6, 2023 to file a Response to the Amended Complaint.

¹ The SEC is currently engaging in efforts to serve Defendant Sameer Ramani.

7. The Parties agree the SEC may have until April 6, 2023, to file a Brief in Opposition.

8. The Parties agree the Defendants may have until May 8, 2023, to file a Reply.

9. Accordingly, the Parties stipulate that the requested schedule is supported by good cause and in the interest of judicial economy and the conservation of party resources. The Parties respectfully ask the Court to adopt the following briefing schedule and request the Clerk to reset the deadlines as noticed:

Briefing	Date
Defendants' Response to Amended Complaint	February 6, 2023
Plaintiff's Brief in Opposition	April 6, 2023
Defendants' Reply Brief	May 8, 2023

10. The Parties further agree that discovery shall be stayed in this case until February 6, 2023, subject to further modification by the Court.

A proposed order is included.

DATED this 23rd day of November, 2022.

SO STIPULATED.

Respectfully submitted,

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